

Schlichter Bogard & Denton

100 South 4th Street, Suite 1200
St. Louis, MO 63102
Kristine K. Kraft

314.884.7706
1.800.873.5297
kkraft@uselaws.com

January 13, 2023

VIA EMAIL

Geoffrey M. Drake
King & Spalding, LLP
1180 Peachtree Street NE, Suite 1600
Atlanta, GA 30309
gdrake@kslaw.com

**IN RE: Reid, et al. v. Doe Run Resources Corporation, et al.,
Case No. 4:11-cv-00044-CDP (consolidated cases)**

Dear Geoffrey:

This letter responds to your January 5th letter regarding the issues you raised pertaining to certain Plaintiff Profile Sheets.

1. Defendants identified 76 Plaintiffs who have not produced their Plaintiff Profile Sheet.

We are working to obtain Profile Sheets for these Plaintiffs and anticipate producing approximately 25 of them by January 31. As to the remaining Plaintiffs, additional time is required to complete the production. We anticipate completing the production of these PPS on an ongoing basis. We are diligently working to collect this information and are striving to have the production completed by March 31, but we may need additional time.

For 9 of the 76 Plaintiffs, we intend to file something with the Court to correct the spelling of their names. These 9 Plaintiffs are listed on Table 1, which reflects the name and case number of the case on file, along with the correct spelling of the Plaintiff's name. Their Profile Sheets are part of the production we anticipate being able to provide by January 31.

We do not agree to dismiss the lawsuits filed by any of these Plaintiffs.

2. Defendants identified 7 Plaintiffs who did not notarize their Profile Sheet.

We anticipate providing notarized Profile Sheets for all 7 Plaintiffs by February 28, but we may require additional time.

We do not agree to dismiss the lawsuits filed by any of these Plaintiffs.

Schlichter Bogard & Denton

3. Defendants identified 113 Plaintiffs whose Supplemental Profile Sheets were not notarized.

Each of the 113 Plaintiffs you identified have already produced a notarized Plaintiff Profile Sheet. They subsequently produced a Supplemental Profile Sheet that was not notarized. In my email dated September 2, 2020, I offered to produce DNI cards (Peru's national ID card) for these Plaintiffs in lieu of having their Supplement Profile Sheets notarized, but I never received a response from you.

Along with this letter, we are producing copies of the DNI cards for 90 of the Plaintiffs, who are identified on Table 2. We believe this information suffices as a confirmation that the Plaintiff approved the information contained in the Supplemental Profile Sheet; however, we are also re-initiating efforts to obtain notarized Supplemental Profile Sheets. We anticipate providing notarized Supplemental Profile Sheets for the 113 identified Plaintiffs on a rolling basis and will make all efforts to complete that process by April 28, though we may require additional time.

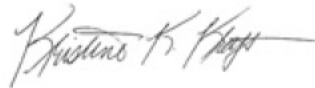
We do not agree to dismiss the lawsuits filed by any of these Plaintiffs.

4. Defendants identified 10 Plaintiffs whose Profile Sheets appear to be missing certain pages.

As to these 10 cases, each Plaintiff has produced multiple pages of their Profile Sheet that are notarized, and it appears that certain pages were missing the notary stamp. We agree to reproduce complete notarized copies of the 10 Profile Sheets you identified on Exhibit E of your letter and will make every effort to obtain them by February 15, but additional time may be necessary.

Please let me know if you would like to discuss any of these matters further.

Very truly yours,



Kristine Kraft, Partner

KK/lsw

cc: Thomas P. Berra
Michael J. Hickey
Edward L. Dowd
Tracie J. Renfroe
Andrew T. Bayman
Carmen Toledo
Nathan Stump
Denisse Icenogle

**Schlichter
Bogard & Denton**

Table 1				
NO.	PLF ID	FILED NAME	CORRECT NAME	CASE NUMBER
1	1	[REDACTED]	[REDACTED]	[REDACTED]
2	2	[REDACTED]	[REDACTED]	[REDACTED]
3	3	[REDACTED]	[REDACTED]	[REDACTED]
4	4	[REDACTED]	[REDACTED]	[REDACTED]
5	5	[REDACTED]	[REDACTED]	[REDACTED]
6	6	[REDACTED]	[REDACTED]	[REDACTED]
7	7	[REDACTED]	[REDACTED]	[REDACTED]
8	8	[REDACTED]	[REDACTED]	[REDACTED]
9	9	[REDACTED]	[REDACTED]	[REDACTED]
10	10	[REDACTED]	[REDACTED]	[REDACTED]

4

[illegible]

